

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	8:09CR457
	)	
vs.	)	2 <sup>nd</sup> SUPPLEMENTAL
	)	NOTICE OF INTENT TO
	)	INTRODUCE EVIDENCE
SHANNON WILLIAMS,	)	PURSUANT TO FED. RULE
DESHAWN HERNANDEZ, and	)	OF EVIDENCE 902(11)
SARA JARRETT	)	
	)	
Defendants.	)	

COMES NOW the Plaintiff, United States of America, by and through the undersigned Assistant United States Attorney, and provides notice, pursuant to Rule 902(11) of the Federal Rules of Evidence, and hereby notices the Defendants, that the United States intends to introduce the following additional documents at trial of the defendants during the Plaintiff's case in chief pursuant to Fed. Rule of Evid. 902(11) as Certified Domestic Records of Regularly Conducted Activity:

- 1) Exhibit 55 is the Certification of Custodian of Records of Joanne Mangis of Well Fargo Bank, for customer account information. These documents were previously provided to the defense in discovery and Bates-stamped nos. 17146-17208.
- 2) Exhibit 76 is the Certification of Custodian of Records of Gilbert Gonzales of Quality Inn, Raton, New Mexico of customer rental documentation. These documents were previously provided to the defense in discovery and Bates-stamped nos. 17092-17102.

3) Exhibit 84 is the Certification of Kevin Martin, the owner of the real estate at 22212 N. 104<sup>th</sup> Avenue., Peoria, Arizona. These documents were previously provided to the defense in discovery and Bates-stamped nos. 17232-17242.

4) Exhibit 89(b) is the Certification of Custodian of Records of James P. Stavneak of Nebraska Default and Title Services for the purchase of properties of 3721 N. 39<sup>th</sup> St., 3365 Erskine St., and 3106 Decatur Street, Omaha, NE. These documents were previously provided to the defense in discovery and Bates-stamped nos. 17225-17231.

5) Exhibit 90(b) is the Certification of Custodian of Records of Alison Torreyson of Servicelink for the purchase of property of 2205 N. 39 Street, Omaha, NE. These documents were previously provided to the defense in discovery and Bates-stamped nos. 17219-17221.

6) Exhibit 92(b) is the Certification of Custodian of Records of Sue Connor of Nebraska Land Title for the purchase of property of 3916 N. 42<sup>nd</sup> Ave., Omaha, NE. These documents were previously provided to the defense in discovery and Bates-stamped nos. 17209-17213.

7) Exhibit 94(b) is the Certification of Custodian of Records of Greg Brigham of Nebraska Title Company for the purchase of property of 1801 Pinkney, Omaha, NE and 2444 Browne Street, Omaha, NE. These documents were previously provided to the defense in discovery and Bates-stamped nos. 3866-3872, 3876-3879, 3881, 3897-3879, 4275, 4279.

8) Exhibit 124 is the Certification of Custodian of Records of Mohammed H. Monakes of Express Jet of flight records. These documents were previously provided to the defense in discovery and Bates-stamped nos. 17118-17128.

Respectfully submitted this 30th day of March, 2011.

UNITED STATES OF AMERICA,  
Plaintiff

By: DEBORAH R GILG  
United States Attorney

And: s/Susan T. Lehr  
SUSAN T. LEHR (#19248)  
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(402) 661-3700

**CERTIFICATE OF SERVICE**

I hereby certify that on March 30, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Mr. Michael J. Tassett,  
Stand-by counsel for Shannon Williams

Mr. Dana C. Bradford, III  
Attorney for Deshawn Hernandez

Mr. Michael A. Nelsen  
Attorney for Sara Jarrett

and I hereby certify that I have personally delivered the document to the following non CM/ECF participants:

Shannon Williams  
CJ-POTTAWATTAMIE, Pottawattamie County Jail  
1400 Big Lake Road  
Council Bluffs, IA 51501

s/Susan T. Lehr  
SUSAN T. LEHR  
Assistant U.S. Attorney